

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION, as
assignee of individuals who are Covered Persons,
JANE DOE-1, *a law enforcement officer,* JANE
DOE-2, *a law enforcement officer,* PATRICK
COLLIGAN, and PETER ANDREYEV,

Plaintiffs,

v.

GREENFLIGHT VENTURE CORP., RICHARD
ROES 1-10, *fictitious names of unknown*
individuals and ABC COMPANIES 1-10, *fictitious*
names of unknown entities,

Defendants.

Case No.: 1:25-CV-01517-HB

JOINT MOTION TO STAY ALL DEADLINES

Plaintiffs ATLAS DATA PRIVACY CORPORATION, as assignee of individuals who are *Covered Persons*, JANE DOE-1, a law enforcement officer, JANE DOE-2, a law enforcement officer, PATRICK COLLIGAN, and PETER ANDREYEV (hereinafter “Plaintiffs”), and GREENFLIGHT VENTURE CORP. (hereinafter “Defendant”), by and through their undersigned respective counsels and subject to the approval of this Court, move to stay all deadlines.

Plaintiffs and Defendant have reached a settlement in principle and are in the process of memorializing the terms of a written settlement agreement. Plaintiffs and Defendant anticipate that they will be able to finalize their settlement within forty-five (45) days. Accordingly, the parties respectfully request that the Court grant a stay of the deadline to respond to the Complaint and/or respective dispositive motions until June 7, 2025.

Plaintiffs and Defendant agree that should a settlement not be achieved by June 7, 2025, nothing shall bar Defendant from filing a responsive pleading and/or dispositive motions in this matter.

Good cause exists for granting this Joint Motion, as set forth above.

Plaintiffs and Defendant, therefore, request that the Court grant their Joint Motion to Stay All Deadlines and stay Defendant’s time to respond and/or file their dispositive motions until June 7, 2025.

Respectfully submitted this 23 day of April 2025.

/s/ Jared M. Wichnovitz

JARED M. WICHNOVITZ, ESQ.
Bar I.D. 414022022
Law Offices of Jared M. Wichnovitz, P.C.
50 Harrison Street, Suite 206
P.O. Box 631
Hoboken, New Jersey 07030
Office: (732) 765-2157
Fax: (732) 358-0178
Jared@WichnovitzLaw.com

/s/ Rajiv D. Parikh

PEM Law LLC
Rajiv D. Parikh
Kathleen Barnett Einhorn
1 Boland Drive, Suite 101
West Orange, New Jersey 07052
(973) 577-5500
RParikh@PemLawFirm.com
KEinhorn@PemLawFirm.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025, a true and correct copy of the foregoing document has been served to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

Dated: April 23, 2025

Law Offices of Jared M. Wichnovitz, P.C.
Attorneys for Defendant, Greenflight Venture Corp.

/s/ Jared M. Wichnovitz
JARED M. WICHNOVITZ, ESQ.